

From: [Melnykovych, Andrew \(PSC\)](#)
To: [REDACTED]
Subject: your comments in case number 2016-00059 - an investigation into the Kentucky Universal Service Fund
Date: Wednesday, March 16, 2016 10:33:10 AM

Dear Mr. FitzGerald:

Thank you for your comments in case number 2016-00059 - an investigation into the Kentucky Universal Service Fund.

Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration.

As you noted, the case number in this matter is 2016-00059. It would be helpful if you would please refer to it in any further correspondence.

The application and other documents in this case are available at
http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2016-00059

Thank you for your interest in this matter.

RECEIVED
By Kentucky PSC at 1:18 pm, Mar 16, 2016

Andrew Melnykovych

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovych@ky.gov

From: [REDACTED]
Sent: Monday, February 22, 2016 4:24 PM
To: PSC - Public Information Officer
Cc: [REDACTED]
Subject: AARP Comments Re: 2016-00059

Greetings.

Please find attached the written comments of AARP regarding the proposed Interim Order in the Kentucky Universal Service Fund case. Thanks in advance.

Tom FitzGerald
Kentucky Resources Council

on behalf of AARP

Humanity did not descend as angelic beings into this world. Nor are we aliens who colonized Earth. We evolved here, one among many species, across millions of years, and exist as one organic miracle linked

to others. The natural environment we treat with such unnecessary ignorance and recklessness was our cradle and nursery, our school, and remains our one and only home. To its special conditions we are intimately adapted in every one of the bodily fibers and biochemical transactions that gives us life.

E.O. Wilson, The Future of Life

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of And Inquiry into the State Universal Service Fund

Case No. 2016-00059

Comments of AARP

AARP welcomes the opportunity to submit comments to the Kentucky Public Service Commission (“PSC” or “Commission”) regarding the Commission’s investigation into the current and future funding, distribution, and administration of the Kentucky Universal Service Fund (“KUSF”).¹ AARP has approximately 460,000 members in Kentucky, many of whom are living on fixed incomes. The affordability of essential services such as basic voice service and broadband access to the Internet are among the top concerns of AARP’s Kentucky members. AARP fully supports state policies that further the goal of making available affordable voice and broadband service for eligible low-income households, including efforts to stabilize and improve the funding and administration of the KUSF.

In its Order initiating this proceeding, the Commission identified two types of issues. The first deals the pressing issue of the pending insolvency of the KUSF. The Commission

¹ In the Matter of An Inquiry into the State Universal Service Fund, Case No. 2016-00059, Order, February 1, 2016 (“Order”).

proposes to address this by either: 1) increasing the per-line charge used to fund the KUSF or 2) reducing the per-line support paid to carriers who offer Lifeline service.² The second category of issues are longer-term considerations, including “the need for continuing the KUSF; future funding levels of KUSF; the possibility of reducing the amount of KUSF support on a permanent basis; past and projected distributions from the KUSF; and, determining the future practices for requesting and receiving support from the KUSF.”³The short- and longer-term questions are not independent, however. In order to evaluate the best course for addressing the immediate problem, it would nonetheless be beneficial for the Commission to come to a better understanding of what has caused the KUSF to go from its nearly \$11 million surplus, as of mid-2012, to the near-deficit state that exists today. If the trend that has caused increased demands on the fund is something that can be reversed through corrective actions by providers, then the Commission should be considering an interim response. However, if the growth in demands on the fund is legitimate and relatively permanent in nature, then a longer-term change is a more appropriate response.

Because of the KUSF’s rapidly deteriorating financial condition, the Commission has concluded, however, that it does not have the luxury of waiting for a more complete record before deciding how to protect the KUSF from insolvency. AARP agrees that this is a paramount objective, so that low-income households do not suffer the disruption of losing KUSF Lifeline support in its entirety while the underlying problems and future needs are explored. The Order mentions the possibility of a \$0.06 increase in the per-line KUSF charge (from \$0.08 to \$0.14) or a reduction of the Lifeline benefit by approximately \$1.50 (from \$3.50 to approximately \$2.00). In AARP’s view, the objective should be to maintain

² *Id.* at 5.

³ *Id.* at 6.

affordable subscribership for as many customers as possible. It seems more probable that a \$1.50 increase in cost will deter a low-income customer from continuing telephone service than that a six (6) cent increase will cause attrition among lower-income customers who nonetheless are above the Lifeline income threshold. AARP considers it important that an adequate level of Lifeline support, comprised of federal and state funding, be maintained for eligible households. AARP is concerned that if KUSF per-line support were to be cut (according to the Commission's Order, by as much as \$1.50 per month), it would be challenging to restore it to the existing level. Increasing the per-line charge by just a few cents over a broader base of customers would seem less disruptive, especially if there is an expectation that the increase can be rescinded once longer-term issues with the fund have been addressed. AARP is not insensitive to the fact that even a modest increase in KUSF per-line charges affects a large number of customers; however, given the decline in wireless expense over the period of 2004 to 2014, when the customer charge was last changed, the modest change needed to preserve the Kentucky Lifeline program at current levels is the preferred option.

In the event that the Commission does not increase the per-line charge in order to preserve the program support at current levels, AARP believes that a combination of cost-cutting and fund-increasing methods would be preferable to attempting to close the gap entirely from the cost side of the equation. In addition, as proposed earlier, whatever approach is taken to restore fiscal stability in the short-term should be subject to subsequent revision based on the Commission's findings in the later phase of the proceeding.

Getting back to the longer-term issues, it is clearly important to understand what is

driving the increased enrollment that has in turn increased the annual support requirements for the KUSF. It is possible that the increased demands on the fund arise from the fact that ETCs have been successful at enrolling previously unserved but legitimately eligible households. If so, this should be considered a positive development, as it means that a greater portion of the intended beneficiaries of the Lifeline program are being reached. On the other hand, it could result from the enrollment of ineligible customers, despite the adoption of reforms in the Lifeline program in 2012, by both the FCC, in its Lifeline Reform Order,⁴ and by the PSC.⁵ The joint efforts of state and federal regulators are key to improving accountability while promoting full participation in the Lifeline program.⁶

Many of the reforms from 2012 were “focused on changes to eliminate waste, fraud, and abuse in the Lifeline program by, among other things: setting a savings target; creating a National Lifeline Accountability Database (NLAD) to prevent multiple carriers from receiving support for the same household; and confirming a one-per-household rule

⁴ Lifeline and Link-Up Reform and Modernization et al., Report and Order and Further Notice of Proposed Rulemaking, WC Nos. 11-42 et al., 27 FCC Rcd 6656 (2012) (“Lifeline Reform Order”).

⁵ Case No. 2012-00146, Lifeline Reform (Ky. PSC May 1, 2012). In particular, the Commission “1) adopted the FCC’s annual audit and recertification process; 2) adopted the eligibility requirement of household income at or below 135 percent of the of the federal poverty level; 3) adopted the application process in the Lifeline Reform Order; and 4) required ETCs to follow the FCC’s rules and direction for annual audits.” Order at 3-4.

⁶ Commenting on federal-state joint efforts in this area, the FCC has noted: “In addition to working with the Commission on universal service policy initiatives on the Joint Board, many states administer their own low-income programs designed to ensure that their residents have affordable access to telephone service and connections. These activities provide the states the opportunity and flexibility to develop new and innovative ways to make the Lifeline program more effective and efficient, and ultimately bring recommendations to the Commission for the implementation of improvements on a national scale. As we continue to modernize the Lifeline program, we deeply value the input of the states as we, among other reforms, seek to streamline the Lifeline administrative process and enhance the program.” In the Matter of Lifeline and Link Up Reform and Modernization, WC Docket Nos. 11-42 et al. 09-197, and 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, 30 FCC Rcd 7818, 7820 (2015) “2015 Further Lifeline Reform Order”).

applicable to all consumers and Lifeline providers in the program.”⁷ The FCC also started to lay the foundation for the expansion of Lifeline service to support broadband access, a goal that it continues to work toward achieving.⁸ In a 2015 Order in its Lifeline and Link-Up Reform and Modernization proceeding, the FCC acknowledged that, while there has been considerable improvement in program administration as a result of the 2012 reforms, additional improvements could still be made. Thus, the FCC has proposed to adopt further reforms, including revised documentation retention requirements and minimum service standards for any provider that receives a Lifeline subsidy. Importantly, the FCC concluded:

We also seek to focus our efforts on targeting funding to those low-income consumers who really need it while at the same time shifting the burden of determining consumer eligibility for Lifeline support from the provider. We further seek to leverage efficiencies from other existing federal programs and expand our outreach efforts.⁹

Better outreach, leveraging the efficiencies of other available programs, and the requirement that providers take responsibility for ensuring the eligibility of the consumers they sign up are key reforms that would also benefit administration of state Lifeline funds.

As part of its investigation, the PSC might also find useful answers by comparing the experience in Kentucky with experience nationwide since 2012. A recent report by the Government Accountability Office¹⁰ notes that where for many years, the lion’s share of disbursements went to wireline carriers, since 2008 there has been a steady increase in the share that go to wireless ETCs: “Since 2008, the Lifeline program shifted from wireline

⁷ *Id.* at 7824.

⁸ *Id.* at 7821

⁹ *Id.*

¹⁰ See GAO, Telecommunications: FCC Should Evaluate the Efficiency and Effectiveness of the Lifeline Program, GAO-15-335 (March 2015) (GAO March 2015 Report)

ETCs, which received at least 82 percent of Lifeline disbursements in 2008, to wireless ETCs, which received 85 percent of disbursements in the third quarter of 2014,” and prepaid wireless service is a major contributor to that shift. This is consistent with the Commission’s observation that the growth in demands on KUSF since 2012 coincides with the authorization of numerous additional prepaid wireless service providers as ETCs.

The GAO also notes that because the transition to wireless service removed the connection between Lifeline service and a physical address, this change increased the likelihood that a household could receive more than one Lifeline-supported service. There have been efforts to address this problem. In particular, the Universal Service Administrative Company (“USAC”) “undertook an in-depth data validation process to identify and remove duplicate subscribers, and reported that it eliminated 2.2 million duplicate subscribers and yielded savings of over \$260 million from 2011 through 2013.”¹¹ However, monitoring and enforcement of the rules that restrict Lifeline support to a single phone service per household remains a challenge.

However, the Kentucky experience does appear to be different from the national trend for the period following the adoption of Lifeline reforms in 2012. Nationally, according to the FCC, “in the time since the reforms were adopted, the size of the Lifeline program has declined steadily. In 2012, the Universal Service Administrative Company (USAC), the Administrator of the Fund, disbursed approximately \$2.2 billion in Lifeline support payments compared to approximately \$1.6 billion in Lifeline support payments in 2014.”¹²

It would be helpful to identify why the Kentucky experience has diverged from the

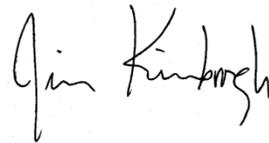
¹¹ GAO March 2015 Report at 26.

¹² 2015 Further Lifeline Reform Order, 30 FCC Rcd at 7821.

experience nationwide. Is the entry of wireless resellers as ETCs occurring somewhat later than in the nation as a whole or are these providers being particularly effective in outreach? Is there any reason to believe that the reforms adopted in 2012 – including the requirement that there be only one subsidized line per household and that inactive lines be eliminated – are not being appropriately verified and enforced by Kentucky ETCs?

AARP is hopeful that the submissions of various ETCs will help to clarify what is happening and encourages the Commission to use this proceeding to investigate ETC practices as well as other factors that may be causing increased demand on the Lifeline program. AARP strongly urges that any reforms in the KUSF preserve the core objectives of supporting universal service among the low-income population. AARP reserves the right to supplement this filing based on information arising in the course of the Commission's investigation.

Respectfully submitted,

A handwritten signature in black ink that reads "Jim Kimbrough". The signature is written in a cursive, slightly slanted style.

James T. Kimbrough
President
AARP Kentucky

February 22, 2016

From: [PSC - Public Information Officer](#)
To: "John Duerr"
Subject: your comments in case number 2016-00059 - an investigation into the Kentucky Universal Service Fund
Date: Wednesday, March 16, 2016 12:52:46 PM

Dear Mr. Duerr:

Thank you for your comments in case number 2016-00059 - an investigation into the Kentucky Universal Service Fund.

Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration.

For your future reference, the case number in this matter is 2016-00059. It would be helpful if you would please refer to it in any further correspondence.

The application and other documents in this case are available at
http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2016-00059

Thank you for your interest in this matter.

RECEIVED
By Kentucky PSC at 1:09 pm, Mar 16, 2016

Andrew Melnykovich

Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovich@ky.gov

From: John Duerr [REDACTED]
Sent: Wednesday, March 16, 2016 12:49 PM
To: PSC - Public Information Officer
Subject: FREE PHONE DEAL

I THINK IT'S WRONG THAT I HAVE TO PAY FOR OTHER PEOPLE TO GET A FREE PHONE THIS IS BULLSHIT. LET THEM GET A JOB LIKE I HAD TO IF THE WANT A PHONE

John Duerr
Crush Bearings and Drives - Louisville Division
4324 Bishop Lane
Louisville, KY 40218

[REDACTED]
[REDACTED]
[REDACTED]

From: [Melnykovich, Andrew \(PSC\)](#)
To: "Joseph Hamilton"
Subject: your comments in case number 2016-00059 - an investigation into the Kentucky Universal Service Fund
Date: Wednesday, March 16, 2016 10:31:01 AM

Dear Mr. Hamilton:

Thank you for your comments in case number 2016-00059 - an investigation into the Kentucky Universal Service Fund.

Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration.

For your future reference, the case number in this matter is 2016-00059. It would be helpful if you would please refer to it in any further correspondence.

The application and other documents in this case are available at
http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2016-00059

Thank you for your interest in this matter.

Andrew Melnykovich
Director of Communications
Kentucky Public Service Commission
502-782-2564 (direct) or 502-564-3940 (switchboard)
502-330-5981 (cell)
Andrew.Melnykovich@ky.gov

RECEIVED
By Kentucky PSC at 1:20 pm, Mar 16, 2016

-----Original Message-----

From: Joseph Hamilton [REDACTED]
Sent: Wednesday, March 16, 2016 6:47 AM
To: Melnykovich, Andrew (PSC)
Subject: Phone program for low income customers

Having a cell phone is a luxury not a right. Instead of handing out multiple cell phones assist those in need with a landline. I work extremely hard for my \$.06 cents and I speak for a lot of people when I say we are tired of people in charge giving away everything. Yes, it's a small amount but where does it end? Stop giving away hard working people's money.

Joe Hamilton

Joe Hamilton

*Wireless Telecom Cooperative, Inc. d
Wireless Telecom Cooperative, Inc. dba
2317 West Chestnut Street
Louisville, KY 40211

*Pix Wireless, LLC
Pix Wireless, LLC
21346 Saint Andrews Blvd, Suite 225
Boca Raton, FL 33433

*Communications Venture Corporation d/b/a
Communications Venture Corporation d/b/a
1616 Directors Row
Fort Wayne, IN 46808

*Wireless Telecom Cooperative, Inc. d
Wireless Telecom Cooperative, Inc. dba
2317 West Chestnut Street
Louisville, KY 40211

*Tele Circuit Network Corporation
Tele Circuit Network Corporation
1815 Satellite Blvd, Suite 504
Duluth, GA 30097

*Stream Communications, LLC
Stream Communications, LLC
1950 Stemmons Fwy, Suite 3000
Dallas, TX 75207

*T.V. Service, Inc.
T.V. Service, Inc.
2742 Hwy 550 E
Hindman, KY 41822

*Flatel Wireless, Inc dba Zing PCS
Flatel Wireless, Inc dba Zing PCS
P. O. Box 211192
Royal Palm Bch, FL 33421

*CampusTVs, Inc.
CampusTVs, Inc.
598 Boston Post Road
Weston, MA 02493

*Tempo Telecom, LLC
Tempo Telecom, LLC
2323 Grand Blvd, Suite 925
Kansas City, MO 64108

*ATC Outdoor DAS, LLC
ATC Outdoor DAS, LLC
10 Presidential Way
Woburn, MA 01801

*UnityComm, LLC
UnityComm, LLC
101 E Main Street
P. O. Box 250
Syracuse, IN 46567

*Tempo Telecom, LLC
Tempo Telecom, LLC
2323 Grand Blvd, Suite 925
Kansas City, MO 64108

*Thacker-Grigsby Telephone Company, I
Thacker-Grigsby Telephone Company, Inc.
60 Communications Lane
P. O. Box 789
Hindman, KY 41822

*X5 OpCo LLC
X5 OpCo LLC
1008 Western Avenue, Suite 400
Seattle, WA 98104

*L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Thacker-Grigsby Telephone Company, I
Thacker-Grigsby Telephone Company, Inc.
60 Communications Lane
P. O. Box 789
Hindman, KY 41822

*CityNet Kentucky, LLC
CityNet Kentucky, LLC
100 Citynet Drive
Bridgeport, WV 26330

*MCC Telephony of the South, LLC d/b/a
MCC Telephony of the South, LLC d/b/a
One Mediacom Way
Mediacom Park, NY 10918

*IBFA Acquisition Company, LLC
IBFA Acquisition Company, LLC
353 Sacramento Street
Suite 1500
San Francisco, CA 94111

*Simple Signal, Inc.
Simple Signal, Inc.
34232 Pacific Coast Highway
Suite E
Dana Point, CA 92629

*R. Brooks Herrick
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202

*Blue Jay Wireless, LLC
Blue Jay Wireless, LLC
5010 Addison Circle
Addison, TX 75001

*Acorn Telephone LLC
Acorn Telephone LLC
5550 77 Center Drive, Suite 220
Charlotte, NC 28217

*Leslie County Telephone Company, Inc
Leslie County Telephone Company, Inc.
22076 Main Street
P. O. Box 969
Hyden, KY 41749-0969

*Brandenburg Telecom, LLC
Brandenburg Telecom, LLC
200 Telco Drive
Brandenburg, KY 40108

*Dialog Telecommunications, Inc.
Dialog Telecommunications, Inc.
5550 77 Center Drive, Suite 220
Charlotte, NC 28217

*Lewisport Telephone Company, Inc.
Lewisport Telephone Company, Inc.
30 Pell Street
Lewisport, KY 42351

*Brandenburg Telephone Company, Inc.
Brandenburg Telephone Company, Inc.
200 Telco Road
P. O. Box 599
Brandenburg, KY 40108

*Cindy D McCarty
Staff Attorney
East Kentucky Network, LLC dba Appalachian
101 Technology Trail
Ivel, KY 41642

*Salem Telephone Company
Salem Telephone Company
221 East Main Street
P. O. Box 25
Salem, KY 42078-0025

*West Virginia PCS Alliance, L.C. dba NTELOS
West Virginia PCS Alliance, L.C. dba NTELOS
1154 Shenandoah Village Drive
P. O. Box 1990
Waynesboro, VA 22980

*ExteNet Systems, Inc.
ExteNet Systems, Inc.
3030 Warrenville Road, Suite 340
Lisle, IL 60532

*Knology of Kentucky, Inc. dba WOW! Internet,
Knology of Kentucky, Inc. dba WOW! Internet,
1241 O. G. Skinner Drive
West Point, GA 31833

*WDT Wireless Telecommunications, Inc
WDT Wireless Telecommunications, Inc.
13644 Neutron Road
Dallas, TX 75244

*Velocity The Greatest Phone Company
Velocity The Greatest Phone Company Ever, Inc.
7130 Spring Meadows Drive West
Holland, OH 43528

*MuniNet Fiber Agency
MuniNet Fiber Agency
1500 Broadway Street
Paducah, KY 42001

*Cincinnati Bell Telephone Company
Cincinnati Bell Telephone Company
221 East Fourth Street
Room 103-1280
Cincinnati, OH 45202

*Credo Mobile, Inc.
Credo Mobile, Inc.
101 Market Street, Suite 700
San Francisco, CA 94105

*The Electric Plant Board of the City d/b/a
The Electric Plant Board of the City of Paducah,
1500 Broadway Street
Paducah, KY 42001

*Mobilite, LLC
Mobilite, LLC
2220 Univeristy Drive
Newport Beach, CA 92660

*Alliance Global Networks, LLC
Alliance Global Networks, LLC
1221 Post Road East
Westport, CT 06880

*KDDI America, Inc.
KDDI America, Inc.
825 Third Avenue, 3rd Floor
New York, NY 10022

*AmeriMex Communications Corp. dba SafetyNet
AmeriMex Communications Corp. dba SafetyNet
200 Mansell Ct E, Suite 105
Roswell, GA 30076

*Jack W. Pruitte dba First Phone
Jack W. Pruitte dba First Phone
3281-B Fort Campbell Blvd
P. O. Box 504
Clarksville, TN 37042

*Highland Telephone Cooperative, Inc.
Highland Telephone Cooperative, Inc.
7840 Morgan County Highway
P. O. Box 119
Sunbright, TN 37872

*Kentucky RSA #3 Cellular General Partnership,
Kentucky RSA #3 Cellular General Partnership,
2902 Ring Road
P. O. Box 5012
Elizabethtown, KY 42701

*The People's Operator USA, LLC
The People's Operator USA, LLC
915 Broadway, Suite 1306
New York, NY 10010

*South Central Telcom, LLC
South Central Telcom, LLC
1399 Happy Valley Road
P. O. Box 159
Glasgow, KY 42142-0159

*Kentucky RSA #4 Cellular General Partnership,
Kentucky RSA #4 Cellular General Partnership,
2902 Ring Road
P. O. Box 5012
Elizabethtown, KY 42701

*Air Voice Wireless, LLC
Air Voice Wireless, LLC
2425 Franklin Road
Bloomfield Hill, MI 48302

*South Central Rural Telephone Cooperative
South Central Rural Telephone Cooperative
1399 Happy Valley Road
P. O. Box 159
Glasgow, KY 42142-0159

*NetDiverse, LLC
NetDiverse, LLC
885 Sandhurst Drive
Salt Lake City, UT 84103

*Ready Wireless, LLC
Ready Wireless, LLC
955 Kacena Road, Suite A
Hiawatha, IA 52233

*David S Samford
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Logan Telephone Cooperative, Inc.
Logan Telephone Cooperative, Inc.
10725 Bowling Green Road
P. O. Box 97
Auburn, KY 42206

*PEG Bandwidth IL, LLC
PEG Bandwidth IL, LLC
3 Bala Plaza East, Suite 502
Bala Cynwyd, PA 19004

*Konatel, Inc. dba telecom.mobi
Konatel, Inc. dba telecom.mobi
1910 Minno Drive, Suite 210
Johnstown, PA 15905

*EOS Mobile Holdings, LLC
EOS Mobile Holdings, LLC
640 Fairway View Terrace
Southlake, TX 76092

*QuantumShift Communications, Inc. dba vCom
QuantumShift Communications, Inc. dba vCom
12657 Alcosta Blvd, Suite 418
San Ramon, CA 94583

*Douglas E Hart
441 Vine Street, Suite 4192
Cincinnati, OHIO 45202

*Image Access, Inc. dba NewPhone
Image Access, Inc. dba NewPhone
7324 Southwest Freeway, Suite 475
Houston, TX 77074

*Inter-Mountain Cable, Inc. dba MTS C
Inter-Mountain Cable, Inc. dba MTS
20 Laynesville Road
P. O. Box 160
Harold, KY 41635

*Gearheart Communications Company, In dba
Gearheart Communications Company, Inc. dba
20 Laynesville Road
Harold, KY 41635

*France Telecom Corporate Solutions L
France Telecom Corporate Solutions L.L.C.
13775 McLearen Road
Mail Stop 1100
Oak Hill, VA 20171-3212

*American Broadband and Telecommunica
American Broadband and Telecommunications
1 Seagate, Suite 600
Toledo, OH 43699

*TVD Broadband Services, LLC
TVD Broadband Services, LLC
20 Laynesville Road
P. O. Box 160
Harold, KY 41635

*France Telecom Corporate Solutions L
France Telecom Corporate Solutions L.L.C.
13775 McLearen Road
Mail Stop 1100
Oak Hill, VA 20171-3212

*American Broadband and Telecommunica
American Broadband and Telecommunications
1 Seagate, Suite 600
Toledo, OH 43699

*dishNet Wireline, LLC
dishNet Wireline, LLC
9601 S Meridian Blvd
Englewood, CO 80112

*Bluegrass Telephone Company, Inc. dba
Bluegrass Telephone Company, Inc. dba
101 Mill Street
Leitchfield, KY 42754

*Timberline Specialized Management, L
Timberline Specialized Management, LLC
5271 Memorial Drive, Suite 200
Houston, TX 77007

*Consumer Cellular, Incorporated
Consumer Cellular, Incorporated
7204 SW Durham Road, Suite 300
Portland, OR 97224

*John E Selent
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202

*Peoples Rural Telephone Cooperative
Peoples Rural Telephone Cooperative
Highway 421 South
P. O. Box 159
McKee, KY 40447

*Easton Telecom Services, LLC
Easton Telecom Services, LLC
3046 Brecksville Road
Summit II, Unit A
Richfield, OH 44286

*SpeedBeam Lexington, LLC
SpeedBeam Lexington, LLC
3070 Lakecrest Circle
Lexington, KY 40513

*Peoples Telecom, LLC
Peoples Telecom, LLC
259 Main Street
P. O. Box 159
McKee, KY 40447

*Crexendo Business Solutions, Inc.
Crexendo Business Solutions, Inc.
1615 S 52nd Street
Tempe, AZ 85281

*Tennessee Independent Telecommunicat dba
Tennessee Independent Telecommunications
211 Commerce Street, Suite 610
Nashville, TN 37201

*Nextlink Wireless, LLC
Nextlink Wireless, LLC
13865 Sunrise Valley Drive
Herndon, VA 20171

*BetterWorld Telecom, LLC
BetterWorld Telecom, LLC
11951 Freedom Drive, 13th Floor
Reston, VA 20190

*Armstrong Telecommunications, Inc.
Armstrong Telecommunications, Inc.
One Armstrong Place
Butler, PA 16001

*Telrite Corporation
Telrite Corporation
4113 Monticello Street
Covington, GA 30014

*Telrite Corporation dba Life Wireless
Telrite Corporation dba Life Wireless
4113 Monticello Street
Covington, GA 30014

*Momentum Telecom, Inc.
Momentum Telecom, Inc.
880 Montclair Road, Suite 400
Birmingham, AL 35213

*Touchtone Communications, Inc.
Touchtone Communications, Inc.
16 South Jefferson Road
Whippany, NJ 07981

*Infinity Communications, LLC
Infinity Communications, LLC
20110 Messina
San Antonio, TX 78258

*Budget Prepay, Inc. dba Budget Phone
Budget Prepay, Inc. dba Budget Phone
1325 Barksdale Blvd, Suite 200
Bossier City, LA 71111

*Touchtone Communications, Inc.
Touchtone Communications, Inc.
16 South Jefferson Road
Whippany, NJ 07981

*BCN Telecom, Inc.
BCN Telecom, Inc.
1200 Mt. Kemble Ave, 3rd Floor
Morristown, NJ 07960

*Budget PrePay, Inc. dba Budget Mobil
Budget PrePay, Inc. dba Budget Mobile
1325 Barksdale Blvd, Suite 200
Bossier City, LA 71111

*TAG Mobile, LLC
TAG Mobile, LLC
1330 Capital Parkway
Carrollton, TX 75006

*BCN Telecom, Inc.
BCN Telecom, Inc.
1200 Mt. Kemble Ave, 3rd Floor
Morristown, NJ 07960

*Larry Cook
Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
Suite 200
Frankfort, KENTUCKY 40601-8204

*NET TALK.COM, INC.
NET TALK.COM, INC.
1100 NW 163rd Drive, Suite 3
N Miami Beach, FL 33167

*inContact, Inc. d/b/a UCN, Inc.
inContact, Inc. d/b/a UCN, Inc.
7730 South Union Park Avenue
Suite 500
Midvale, UT 84047

*East Kentucky Network, LLC dba Appal
East Kentucky Network, LLC dba Appalachian
101 Technology Trail
Ivel, KY 41642

*Cumberland Cellular Partnership d/b/a Bluegrass
Cumberland Cellular Partnership d/b/a Bluegrass
2902 Ring Road
P. O. Box 5012
Elizabethtown, KY 42701

*Local Access LLC
Local Access LLC
11442 Lake Butler Blvd
Windermere, FL 34786

*East Kentucky Network, LLC
East Kentucky Network, LLC
101 Technology Trail
Ivel, KY 41642

*Bluegrass Wireless, LLC
Bluegrass Wireless, LLC
2902 Ring Road
P. O. Box 5012
Elizabethtown, KY 42701

*BCM One, Inc.
BCM One, Inc.
521 5th Avenue, 14th Floor
New York, NY 10175

*Luke Morgan
McBrayer, McGinnis, Leslie and Kirkland, PLLC
201 East Main Street
Suite 1000
Lexington, KENTUCKY 40507

*ALEC, LLC
ALEC, LLC
250 W Main Street, Suite 1920
Lexington, KY 40507-1734

*Kentucky Hearing and Telephone Corpo d/b/a
Kentucky Hearing and Telephone Corporation
5070 Mark IV Parkway
Fort Worth, TX 76106

*Globalstar USA, LLC
Globalstar USA, LLC
300 Holiday Square Blvd
Covington, LA 70433

*Cintex Wireless, LLC
Cintex Wireless, LLC
11426 Rockville Pike, Suite 230
Rockville, MD 20852

*MCIMetro Access Transmission Service d/b/a
MCIMetro Access Transmission Services, LLC
5055 North Point Parkway
Alpharetta, GA 30022

*Phone Club Corporation
Phone Club Corporation
4262 Old A1A
Palm Coast, FL 32137

*Ballard Rural Telephone Cooperative
Ballard Rural Telephone Cooperative Corporation
159 W 2nd Street
P. O. Box 209
La Center, KY 42056-0209

*North Central Telephone Cooperative,
North Central Telephone Cooperative, Inc.
872 Highway 52 By-Pass E
P. O. Box 70
Lafayette, TN 37083-0070

*Q Link Wireless, LLC
Q Link Wireless, LLC
499 East Sheridan Street, Suite 400
Dania, FL 33004

*Lycamobile USA, Inc.
Lycamobile USA, Inc.
24 Commerce Street, Suite 100
Newark, NJ 07102

*North Central Communications, Inc.
North Central Communications, Inc.
872 Highway 52 By-Pass E
P. O. Box 70
Lafayette, TN 37083

*ComTech 21, LLC
ComTech 21, LLC
One Barnes Park South
Wallingford, CT 06492

*Beaver Telecom, LLC
Beaver Telecom, LLC
1509 McDuffie Street
Houston, TX 77019

*SelecTel, Inc. d/b/a SelecTel Wirele
SelecTel, Inc. d/b/a SelecTel Wireless
1825 N Bell Street
Freemont, NE 40504

*Boomerang Wireless, LLC
Boomerang Wireless, LLC
955 Kacena Road, Suite A
Hiawatha, IA 52233

*Foothills Rural Telephone Cooperativ
Foothills Rural Telephone Cooperative
1621 Kentucky Route 40 W
P. O. Box 240
Staffordsville, KY 41256

*Windward Wireless LLC
Windward Wireless LLC
3245 Peachtree Pkwy, Suite D
Suwanee, GA 30024

*Total Call Mobile, Inc.
Total Call Mobile, Inc.
1411 W 190th Street, Suite 650
Gardena, CA 90248

*Cellular Services, LLC
Cellular Services, LLC
1621 KY Route 40W
P. O. Box 240
Staffordsville, KY 41256

*Windward Wireless LLC
Windward Wireless LLC
3245 Peachtree Pkwy, Suite D
Suwanee, GA 30024

*e-Tel, LLC dba e-Tel Murray, LLC
e-Tel, LLC dba e-Tel Murray, LLC
607 Broadway
Paducah, KY 42001

*Sunset Fiber, LLC
Sunset Fiber, LLC
333 Fraley Avenue
Duffield, VA 24244

*TracFone Wireless, Inc.
TracFone Wireless, Inc.
9700 NW 112th Avenue
Miami, FL 33178

*Mountain Rural Telephone Cooperative
Mountain Rural Telephone Cooperative
405 Main Street
P. O. Box 399
West Liberty, KY 41472-0399

*Rural Cellular Corporation dba Verizon Wireless
Rural Cellular Corporation dba Verizon Wireless
One Verizon Way
Mailcode VC53S475
Basking Ridge, NJ 07920

*iCore Networks, Inc.
iCore Networks, Inc.
7900 Westpark Drive, Suite A-315
McLean, VA 22102

*OneTone Telecom, Inc.
OneTone Telecom, Inc.
100 Century Plaza
Suite 9-1
Seneca, SC 29672

*Alltel Communications, LLC
Alltel Communications, LLC
One Verizon Way
Mailcode VC53S475
Basking Ridge, NJ 07920

*365 Wireless, LLC
365 Wireless, LLC
2870 Peachtree Road, Suite 951
Atlanta, GA 30305

*Defense Mobile Corporation
Defense Mobile Corporation
518 Riverside Avenue
Westport, CT 06880

*PLATINUMTEL COMMUNICATIONS, LLC d/b/
PLATINUMTEL COMMUNICATIONS, LLC d/b/a
8108 South Roberts Road
Justice, IL 60458

*365 Wireless, LLC
365 Wireless, LLC
2870 Peachtree Road, Suite 951
Atlanta, GA 30305

*Cellco Partnership dba Verizon Wirel
Cellco Partnership dba Verizon Wireless
One Verizon Way
Mailcode VC53S475
Basking Ridge, NJ 07920

*Win.Net Telecommunications, Inc.
Win.Net Telecommunications, Inc.
332 W Broadway, Suite 214
Louisville, KY 40202

*Nexus Communications, Inc.
Nexus Communications, Inc.
3629 Cleveland Avenue, Suite C
Columbus, OH 43224

*GTE Wireless of the Midwest dba Veri
GTE Wireless of the Midwest dba Verizon
One Verizon Way
Mailcode VC53S475
Basking Ridge, NJ 07920

*Easy Telephone Service Company dba E
Easy Telephone Service Company dba Easy
4352 SE 95th Street
Ocala, FL 34480

*Nexus Communications, Inc.
Nexus Communications, Inc.
3629 Cleveland Avenue, Suite C
Columbus, OH 43224

*Kentucky RSA #1 Partnership
Kentucky RSA #1 Partnership
One Verizon Way
Mailcode VC53S475
Basking Ridge, NJ 07920

*PNG Telecommunications, Inc. dba Pow dba
PNG Telecommunications, Inc. dba PowerNet
8805 Governor's Hill Drive
Suite 250
Cincinnati, OH 45249

*SI Wireless, LLC dba MobileNation dba Twigby
SI Wireless, LLC dba MobileNation dba Twigby
1275 North Reed Station Road
Carbondale, IL 62902

*New Par dba Verizon Wireless
New Par dba Verizon Wireless
One Verizon Way
Mailcode VC53S475
Basking Ridge, NJ 07920

*PNG Telecommunications, Inc. dba Pow dba
PNG Telecommunications, Inc. dba PowerNet
8805 Governor's Hill Drive
Suite 250
Cincinnati, OH 45249

*Solavei, LLC
Solavei, LLC
10500 NE 8th Street, Suite 1300
Bellevue, WA 98004

*IM Telecom, LLC d/b/a Infiniti Mobil
IM Telecom, LLC d/b/a Infiniti Mobile
1855 East 15th Street
Tulsa, OK 74104

*AT&T Corp.
AT&T Corp.
601 W Chestnut Street
4th Floor East
Louisville, KY 40203

*West Kentucky Rural Telephone Cooper dba
West Kentucky Rural Telephone Cooperative
237 North Eighth Street
P. O. Box 649
Mayfield, KY 42066-0649

*BellSouth Telecommunications, LLC db
BellSouth Telecommunications, LLC dba AT&T
601 W Chestnut Street
4th Floor East
Louisville, KY 40203

*New Cingular Wireless PCS, LLC dba A
New Cingular Wireless PCS, LLC dba AT&T
1010 N St Mary's Street, 9th Floor
San Antonio, TX 78215

*NextGen Communications, Inc.
NextGen Communications, Inc.
275 West Street, Suite 400
Annapolis, MD 21401

*BellSouth Telecommunications, LLC db
BellSouth Telecommunications, LLC dba AT&T
601 W Chestnut Street
4th Floor East
Louisville, KY 40203

*Velocity Networks of Kentucky, Inc.
Velocity Networks of Kentucky, Inc.
120 East Third Street
Russellville, KY 42276

*Ted Heckman
Managing Director, Regulatory & Government
Cincinnati Bell Telephone Company
221 E Fourth Street, Room 103-1170
Cincinnati, OH 45202

*Teleport Communications America, LLC
Teleport Communications America, LLC
601 W Chestnut Street
4th Floor East
Louisville, KY 40203

*Telecommunication Properties, Inc.
Telecommunication Properties, Inc.
901 Main Street, Suite 2600
Dallas, TX 75202

*Cumberland Cellular, Inc. dba Duo Co
Cumberland Cellular, Inc. dba Duo County
2150 N Main Street
P. O. Box 80
Jamestown, KY 41269

*BellSouth Long Distance, Inc. dba AT
BellSouth Long Distance, Inc. dba AT&T Long
601 W Chestnut Street, Suite 408
Louisville, KY 40203

*i-Wireless, LLC
i-Wireless, LLC
1 Levee Way, Suite 3104
Newport, KY 41071

*Wild Telecommunications, Inc.
Wild Telecommunications, Inc.
220 Greenbriar Road
Lexington, KY 40503

*Cricket Wireless, LLC
Cricket Wireless, LLC
12735 Morris Road, Building 200
Alpharetta, GA 30004

*Eastern Telephone & Technologies
Eastern Telephone & Technologies
106 Power Drive
Pikeville, KY 41501

*Edward T Depp
Dinsmore & Shohl, LLP
101 South Fifth Street
Suite 2500
Louisville, KENTUCKY 40202

*Duo County Telephone Cooperative Cor
Duo County Telephone Cooperative Corporation,
2150 N Main Street
P. O. Box 80
Jamestown, KY 42629

*Windstream Norlight, LLC
Windstream Norlight, LLC
4001 Rodney Parham Road
Little Rock, AR 72212

*US LEC of Tennessee, LLC dba PAETEC
US LEC of Tennessee, LLC dba PAETEC
4001 N Rodney Parham Road
Little Rock, AR 72212

*Windstream Communications, LLC
Windstream Communications, LLC
4001 Rodney Parham Road
Little Rock, AR 72212

*Windstream Kentucky West, LLC
Windstream Kentucky West, LLC
4001 Rodney Parham Road
Little Rock, AR 72212

*Windstream KDL, LLC
Windstream KDL, LLC
4001 Rodney Parham Road
Little Rock, AR 72212

*Windstream NuVox, LLC
Windstream NuVox, LLC
4001 Rodney Parham Road
Little Rock, AR 72212

*PAETEC Communications, LLC
PAETEC Communications, LLC
4001 N Rodney Parham Road
Little Rock, AR 72212

*Talk America, LLC
Talk America, LLC
4001 N Rodney Parham Road
Little Rock, AR 72212

*Windstream NTI, LLC
Windstream NTI, LLC
4001 Rodney Parham Road
Little Rock, AR 72212

*Network Telephone, LLC
Network Telephone, LLC
4001 N Rodney Parham Road
Little Rock, AR 72212

*Windstream Kentucky East, LLC
Windstream Kentucky East, LLC
4001 Rodney Parham Road
Little Rock, AR 72212

*McLeodUSA Telecommunications Service
McLeodUSA Telecommunications Services, LLC
4001 N Rodney Parham Road
Little Rock, AR 72212

*Campus Communications Group, Inc.
Campus Communications Group, Inc.
206 North Randolph Street, Suite 200
Champaign, IL 61820

*The Other Phone Company, LLC dba Access
The Other Phone Company, LLC dba Access One
4001 N Rodney Parham Road
Little Rock, AR 72212